



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ASS/MAA/LB/CJN
F. #2017R05903

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 3, 2023

By Email and ECF

Thomas C. Green
Mark D. Hopson
Michael A. Levy
Brian J. Stretch
Douglas A. Axel
Melissa Colon-Bosolet
Sidley Austin LLP

David Bitkower
Matthew S. Hellman
Matthew D. Cipolla
Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's reproduction of 2063 documents in response to your request to downgrade certain documents previously produced as "Sensitive Discovery Material" ("SDM"). In addition, we are re-producing 955 documents which were previously inadvertently produced without the appropriate designations under the Protective Order entered by the Court on June 10, 2019. See ECF Docket Entry No. 57. These two productions are being made in accordance with Rule 16 of the Federal Rules of Criminal Procedure and pursuant to the Protective Order.

The 2063 documents listed on the spreadsheet attached to this letter¹ are those which were previously produced as SDM and are now being reproduced as “Discovery Material” under the Protective Order.

Very truly yours,

CAROLYN POKORNY
Attorney for the United States
Acting Under Authority Conferred by 28
U.S.C. § 515
Eastern District of New York

By: /s/ Meredith A. Arfa
Alexander A. Solomon
Meredith Arfa
Assistant United States Attorneys
(718) 254-7000

BRENT WIBLE
Chief, Money Laundering and Asset
Recovery Section, Criminal Division
U.S. Department of Justice

By: /s/ Christian J. Nauvel
Christian J. Nauvel
Laura Billings
Trial Attorneys

JAY I. BRATT
Chief, Counterintelligence and Export
Control Section
National Security Division, U.S. Department
of Justice

By: /s/ David Lim
David Lim
R. Elizabeth Abraham
Trial Attorneys

cc: Clerk of the Court (AMD) (by ECF) (without Enclosures)

¹ For ease of reference, this spreadsheet lists the new Bates number (PRODUCTION BEGDOC (REPROD)) alongside the original Bates number (PRODUCTION BEGDOC).